



# LAW FIRM of CALEB MOORE, PLLC

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## CONFERRING RE CURRENT OPERATIONS OF THE JOINT VENTURE

February 7, 2019

Anson Financial, Inc.  
Nate Richards  
J. Michael Ferguson  
J. Michael Ferguson, PC  
62 Main Street, Suite 310  
Colleyville, Texas 76034

**Via Email Only**

Re: *Frazier v. Anson Financial Inc*; Cause No. 342-288776-16

Mike, Nate:

I am attaching two IRS Lien releases related to Mr. Frazier's personal dispute with the IRS that you were concerned about when we last spoke.

While it is related to the litigation, this letter is sent on behalf of my client related to the ongoing business operations of the Joint Venture. From my review of the facebook communications with other owners out there, it does not appear there is any consensus on forming an HOA at this point in time. It also does not appear there is any consensus on what to do with the roads and any sharing of that cost between all of the current owners or really any plan. It seems an HOA is opposed by at least some owners.

I have not found anything indicating that the JV has a legal obligation to fix those roads. If you disagree, please send me any document you want me to review or state in writing why you disagree or what you think has created liability to the JV. Please identify the section of the document as well as the name of any owner who has sent the JV a demand letter or who has taken some action you are aware of that indicates another owner is planning on asserting a claim against the JV.

I believe you produced 12,341 bates labeled pgs. We have not laid eyes on every page at this point, but I have looked at thousands of pages. Based on the PDF labels you placed on the

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**PLs' Exhibit 46**

electronic documents produced I have for sure reviewed everything that could reasonably include a 2017 or 2018 financial record for the JV. In those records, I am not finding anything that tells me how much the JV has in cash right now, what expenses have been paid to who in 2017 or 2018. I can't tell what amount of money, if any, Anson has removed in 2017 and 2018 or is holding.

Please provide me a written response with the current amount of money the JV has, the amounts of any withdrawals or disbursements to Anson, including the date the money went to Anson.

My understanding is Anson uses financial accounting software. There are reports in early 2017 and 2016 and before indicating Anson has the ability to run financial reports. Please provide me with complete 2017 reporting on the JV's finances for 2017 and whatever you have to date on 2018. I request copies of the records showing the amounts and services or materials for all expenses paid out in 2017 and 2018. At a minimum you should be able to run a statement of cash flows, profit and loss and balance sheet report for 2017 and 2018. If you are using quick books, it also has a transaction by vendor report for expenses. Please respond in writing as whether you will provide the requested information or not.

Notice regarding blank pages. I am not sure if these pages contained information or were just inadvertently left in, but there are quite a few blank pages. For instance, 11,883; 11,885-11,892; 11,899; 11,901-11,906; 11,908; 11,910-11,916. There are quite a few more. Please confirm that the blank pages that are dispersed throughout the \$12,000+ pages you sent did not have information that you intended and believe you have produced.

I look forward to hearing back.

Kind regards,

A handwritten signature in black ink that reads "Caleb Moore". The signature is written in a cursive, flowing style.

Caleb Moore